

**REMARKS/ARGUMENTS**

Prior to the entry of this amendment, claims 15-21, 23-28, 35-38, 44-46, 48, 49, 51, and 52 were pending in this application. Claims 15-17, 21, 25-28, 35, 36, 44, 48, 49, 51, and 52 have been amended, no claims have been added, and no claims have been canceled herein. Therefore, claims 5-21, 23-28, 35-38, 44-46, 48, 49, 51, and 52 remain pending in the application. The applicants respectfully request reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 103 Rejection, Lektion in view of Burkett**

The Office Action has rejected claims 15-21, 23-28, 35-38, 44-46, 48, 49, 51 and 52 under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,418,446 of Lektion et al. (hereinafter "Lektion") in view of U. S. Patent No. 6,671,853 of Burkett et al. (hereinafter "Burkett"). The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests determining dynamic members of a user group. Furthermore, neither reference teaches or suggests determining dynamic members of a user

group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group.

Lecture is directed to "a technique whereby data from a dynamic schema, having dynamically variable record formats, can be easily and efficiently accommodated by program code processing that data, without requiring modification of the code that processes the data each time the underlying data format changes." (Col. 2, lines 59-65. See also, Abstract) Lecture discloses a process "for gathering data having dynamically variable record formats such as those created when a dynamic schema is used with a data repository." (Col. 3, lines 32-34) More specifically:

"This technique comprises: providing an input data source comprising one or more records, wherein each of the records has this dynamically variable record format, and wherein the dynamically variable record format of each record comprises a plurality of dynamically variable fields; processing a gather verb specification, wherein the gather verb specification identifies a selected one of the records from the input data source and an output data destination; gathering the dynamically variable fields from the selected one of the records according to the gather verb specification; and transferring the gathered dynamically variable fields to the output data destination according to the gather verb specification, wherein the gathering and the transferring flexibly adapt to a presence or an absence of the dynamically variable fields." (Col. 3, lines 34-48)

Lecture discloses "dynamically variable record formats" and "dynamically variable fields" but not determining dynamic members of a user group. However, Lecture does not teach or suggest determining dynamic members of a user group. Rather, Lecture teaches an input data source having a dynamically variable record format. Furthermore, Lecture does not teach or suggest determining dynamic members of a user group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. Rather, Lecture teaches a "gather verb" for gathering and transferring dynamically variable fields from the input source to an output destination.

Burkett relates to selectively streaming documents. (Col. 1, lines 10-12 and Abstract) However Burkett also does not teach or suggest determining dynamic members of a user group. Rather, under Burkett, "the selective streaming technique comprises identifying the static and the changeable portions of a document, and writing the static portions in a serialized binary output format while writing the changeable portions in a tagged, parseable format." (Col. 1, lines 12-17) Furthermore, Burkett also does not teach or suggest determining dynamic members of a user group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group.

The combination of Lektion and Burkett is no more relevant to the pending claims than either reference taken alone since neither reference, alone or in combination teaches or suggests determining dynamic members of a user group. Rather, Lektion teaches an input data source having a dynamically variable record format and gathering and transferring dynamically variable fields from the input source to an output destination while Burkett teaches selectively streaming portions of a document. Furthermore, neither reference, alone or in combination, teaches or suggests determining dynamic members of a user group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group.

Claim 15, upon which claims 16-28 depend, claim 35, upon which claims 36-39 depend, and claim 44, upon which claims 45-47 depend, each recite in part "determining dynamic members of a first user group based on a rule that defines dynamic membership for said first user group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first user group." Neither reference, alone or in combination, teaches or suggests determining dynamic members of a first user group. Rather, Lektion teaches an input data source having a dynamically variable record format and gathering and transferring dynamically variable fields from the input source to an output destination while Burkett teaches selectively streaming portions of a document. Furthermore, neither reference, alone or in combination, teaches or suggests determining dynamic members of a user group based on a rule that defines

dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. For at least these reasons, claims 15-28, 35-39, and 44-47 should be allowed.

Similarly, new claim 48, upon which claims 49-52 depend, recites in part "an identity system adapted to determine dynamic members of a first user group based on a rule that defines dynamic membership for said first user group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first user group." Neither reference, alone or in combination, teaches or suggests determining dynamic members of a first user group. Rather, Lektion teaches an input data source having a dynamically variable record format and gathering and transferring dynamically variable fields from the input source to an output destination while Burkett teaches selectively streaming portions of a document. Furthermore, neither reference, alone or in combination, teaches or suggests determining dynamic members of a user group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. For at least these reasons, claims 48-52 should also be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Appl. No. 09/998,926

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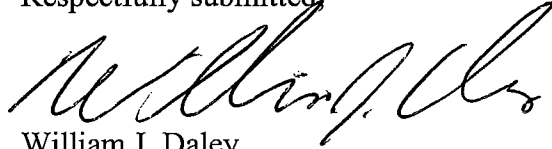
Amdt. dated: May 29, 2007

Reply to Office Action of February 26, 2007

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,



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